



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY

TITLE V OPERATING PERMIT

Permit No.: 136-97-TV

Co/Plant ID: 0244

Effective Date: 01/22/2001

Expiration Date: 01/22/2006

UTM Northing: 4229.3

UTM Easting: 605.4

SIC No.: 2085

NAICS: 31214

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Brown-Forman Distillery Company
Early Times Distillery Company and Shively Warehouse Complex
2921 Dixie Highway
Louisville, Kentucky 40216**

in accordance with the permit application on file with the District and under the conditions in this permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Brown-Forman Distillery Company

Responsible Officials: Leo Reidinger	Title of Responsible Official: VP and General Manager
Bill Coleman	Title of Responsible Official: VP and Director of Production Operations

Date Application Received: 22 April 1997; Revised Initial 22 August 2000

Date Application Administratively Complete: 15 May 1997

Date Public Notice Given: 24 September 2000

Reviewing Engineer (37)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- Airs Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
EC	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
EF	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - I. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner

or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this

permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
 26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
 27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
 28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
 29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
 30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
 31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements

of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

*Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

*US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104*

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

Emission Unit U-1 Description: Grain Handling Operation

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
7.08	Standards of Performance for New Process Operations	1, 2 and 3

Allowable Emissions:

Emission Point	Regulated Air Pollutant	Limit/Standard
E1	Opacity	< 20%
E2	PM	4.76 lbs/hr
	Opacity	< 20%
E3	Opacity	< 20%
E4, E5 & E6	PM	13.6 lbs/hr each Emission Point
	Opacity	< 20%
E7	Opacity	< 20%
E8, E9, E10, E11 & E12	PM	5.38 lbs/hr each Emission Point
	Opacity	< 20%

Components:

Emission Point	Description	Applicable Regulation	Control ID
E1	Truck/Rail Receiving (Corn) Fugitive	N/A	N/A
E2	Corn Storage Silos (2)	6.09	C1 - Bin Vent Fabric Filter
E3	Screw Conveyors (Corn) Fugitive	N/A	N/A
E4	Cage Mill (Corn)	6.09	C2 - Pulse Jet Fabric Filter
E5	Internal Grain Storage Bin (Corn)	7.08	C2 - Pulse Jet Fabric Filter
E6	Weigh Hopper (Corn)	6.09	C2 - Pulse Jet Fabric Filter
E7	Truck/Rail Receiving (Grain) Fugitive	N/A	N/A

Emission Point	Description	Applicable Regulation	Control ID
E8	Storage Silos (2) (Small Grain)	6.09	C3 - Bin Vent Fabric Filter
E9	Screw Conveyors (Grain) Fugitive	N/A	N/A
E10	Cage Mill (Small Grain)	6.09	C2 - Pulse Jet Fabric Filter
E11	Internal Grain Storage Bins (2) Small Grain	7.08	C2 - Pulse Jet Fabric Filter
E12	Weigh Hoppers (2) (Small Grain)	6.09	C2 - Pulse Jet Fabric Filter

Control Devices:

ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C1/C3	Bin Vent Fabric Filter	See AC # 2.a.i.	N/A	Recordkeeping See AC # 2.b.	Semi-annual
C2	Fabric Filter	See AC # 2.a.i.	N/A	Recordkeeping Daily	Semi-annual
C3	Fabric Filter	See AC # 2.a.	N/A	Recordkeeping Daily	Semi-annual

Additional Conditions**1. Standards** (Regulation 2.16, section 4.1.1)**a. PM** (Regulations 6.09 and 7.08, Section 3)

- i. **Opacity Standard** - No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity.
- ii. **Mass Emission Standard** - For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 of Regulations 6.09 and 7.08.

2. Monitoring (Regulation 2.16, Section 4.1.9.1.2)

a. PM

- i. For each PM control device, the owner or operator shall perform the following preventive maintenance measures to assure ongoing compliance with the PM emission limit:
 - 1) For each operating day, verify fan is running and belts are on;
 - 2) On a weekly basis, verify dampers are working properly;
 - 3) On a monthly basis, verify bag cleaning mechanism is working properly;
 - 4) On a monthly basis, verify bags are clean and not filled with dust;
 - 5) On a monthly basis, inspect exhaust stack for signs of dust;
 - 6) Visually inspect the integrity of the baghouse for excessive wear or damage once every calendar quarter; and
 - 7) Visually inspect bags for excessive wear or damage once every calendar quarter and replace if necessary.
- ii. Additional compliance monitoring shall consist of the record keeping specified in AC # 3.a.

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours.
- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emission survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance.

Subsequent visible emission surveys shall be conducted as specified in AC# 2.b.i.

- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

3. Record Keeping (Regulation 2.16, Section 4.1.9.2)**a. PM**

- i. The owner or operator shall maintain the following records to demonstrate ongoing compliance with the hourly PM emission limits:
 - 1) Daily records of the operating hours for emission points E-2, E-4, E-5, E-6, E-8, E-10, E-11 and E-12 for each operating day.
 - 2) Records of the raw material throughput on a monthly basis. Monthly usage records will be used to determine the average hourly throughput.
 - 3) The average hourly PM emission rates for each operating day.
 - 4) Records of the inspections required by AC # 2.a.i. for each PM control device.

b. Opacity

- i. The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC# 2.b.iii. above shall be documented and records made available to the District upon request. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A.

4. Reporting (Regulation 2.16, Section 4.1.9.3)**a. PM**

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:
 - 1) Emission Unit/Point ID number;
 - 2) The beginning and ending date of the reporting period;
 - 3) Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
 - 4) Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
 - 5) Description of any corrective action taken to prevent future exceedances.
 - 6) Identification of any periods when the preventive maintenance measures were not performed according to AC # 2.a.

- b. Opacity
 - i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
 - 1) Emission Unit ID and Stack ID numbers;
 - 2) The beginning and ending date of the reporting period;
 - 3) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
 - 4) The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
 - 5) Description of any corrective action taken pursuant to AC # 2.b.iii.

Emission Unit U-1A Description: Fermentation**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.24	Standards of Performance for Existing Sources Using Organic Materials	1, 2, 3.3, 4, 5, 6 and 7

Allowable Emissions:

Regulated Air Pollutant	Standard/Limit
VOC	450 lbs/hr and 3,000 lbs/day

Components:

Emission Point	Description	Control ID
E40	12 Fermenters (42,000 gallons)	Uncontrolled

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC (Regulation 6.24, section 3.3)
 - i. No owner or operator shall allow or cause a discharge into the atmosphere of more than 3,000 pounds of organic materials in any one day, nor more than 450 pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the discharge has been reduced by at least 85% by weight.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC
 - i. The owner or operator shall monitor the production rate for this emission unit.
3. **Recordkeeping** (Regulation 2.16, section 4.1.9.2)

- a. VOC
 - i. The owner or operator shall maintain records of the production rate for this emission unit.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3)
 - a. VOC
 - i. The potential uncontrolled VOC emission rate is below the emission standard pursuant to District regulation 6.24, section 3.3; therefore, no compliance monitoring reports are required for this emission unit.

Emission Unit U-2 Description: Barrel filling and dumping (liquid transfer) operations.

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance With Emission Standards and Maintenance Requirements	1, 4 and 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4 and 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 6, 7 and 8

Allowable Emissions:

Regulated Air Pollutant	Standard/Limit
VOC	See AC # 1.a

Components:

Emission Point	Description	Applicable Regulation	Control ID
E13	#1 30,000 gal Cistern Tank (1966)	6.13	Uncontrolled
E14	#2 30,000 gal Cistern Tank (1966)	6.13	
E15	#3 30,000 gal Cistern Tank (1966)	6.13	
E16	#4 30,000 gal Cistern Tank (1966)	6.13	
E18	Three (3) tanks 10,000 gal. each (1992)	7.12	
	Four (4) tanks 30,000 gal. each (1992)	7.12	
	Eight (8) tanks 7,300 gal. each (1992)	7.12	
	One (1) tank 20,000 gal. (1992)	7.12	

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC
 - i. There are no emission or equipment standards for the VOC storage tanks.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC
 - i. See AC # 3.a.i.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC
 - i. The owner or operator shall maintain records of the monthly product throughput.
4. **Reporting** (Regulation 2.16, section 4.1.9.3)
 - a. VOC
 - i. There are no semi-annual compliance monitoring reports required.

Emission Unit U-3 Description: By-products processing and handling (Whole Stillage).

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
7.08	Standards of Performance for New Process Operations	1, 2 and 3

Allowable Emissions:

Emission Point	Regulated Air Pollutant	Limit/Standard
E19, E20, E21 & E22	PM	2.75 lbs/hr
	Opacity	< 20 %
E23	PM	4.10 lbs/hr
	Opacity	< 20 %
E24	PM	4.76 lbs/hr
	Opacity	< 20 %
E25	PM	4.12 lbs/hr
	Opacity	< 20 %
E31 & E32	PM	3.68 lbs/hr
	Opacity	< 20 %

Components:

Emission Point	Description	Applicable Regulation	Control ID
E19	#1 Dehydrator/Cyclone	6.09	C7 Wet Scrubber
E20	#2 Dehydrator/Cyclone	6.09	C7 Wet Scrubber
E21	#3 Dehydrator/Cyclone	6.09	C7 Wet Scrubber
E22	#4 Dehydrator/Cyclone	6.09	C7 Wet Scrubber

Emission Point	Description	Applicable Regulation	Control ID
E23	Special Solubles (Dry) Storage Tank	6.09	C8 Bin Vent Fabric Filter
E24	Solubles (Dry) Storage Tank	6.09	C9 Bin Vent Fabric Filter
E25	Distillers Dried Grains (DDG) Storage	7.08	C10 Bin Vent Fabric Filter
E31	Rotary Dryer #1	6.09	N/A
E32	Rotary Dryer #2	6.09	N/A

Control Devices:

Control ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C-7	Wet Scrubber	Pressure Drop	1-5 in H ₂ O	Recordkeeping Daily	Semi-annual
C-8	Bin Vent Fabric Filter	VE Survey	N/A	Recordkeeping See AC # 2.b.	Semi-annual
C-9	Bin Vent Fabric Filter	VE Survey	N/A	Recordkeeping See AC # 2.b.	Semi-annual
C-10	Bin Vent Fabric Filter	VE Survey	N/A	Recordkeeping See AC # 2.b.	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. PM (Regulations 6.09 and 7.08)
 - i. Opacity Standard - No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3)
 - ii. Mass Emission Standard - For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 of Regulations 6.09 and 7.08. (Section 3)

2. Monitoring (Regulation 2.16, Section 4.1.9.1.2)**a. PM**

- i. The owner or operator shall monitor, on a daily basis, the pressure drop across the wet scrubber (C7).

b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission surveys; or
- ii. For each PM emission point where there are no visible emissions observed for twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emission survey.
- iii. At any PM emission point where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as specified in AC # 2.b.i. above.

3. Record Keeping (Regulation 2.16, Section 4.1.9.2)**a. PM**

- i. The owner or operator shall maintain the following records to monitor ongoing compliance with the hourly PM emission limits:
 - 1) The production rate for each operating day;
 - 2) The percent solids in the syrup; and
 - 3) The dehydrator machine speed.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC# 2.b.iii. shall be documented and records made available to the District upon request.

4. Reporting (Regulation 2.16, section 4.1.9.3)**a. PM**

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.09:
 - 1) Emission Unit ID number;
 - 2) The beginning and ending date of the reporting period;
 - 3) Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
 - 4) Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
 - 5) Description of any corrective action taken.
- b. Opacity
 - i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
 - 1) Emission Unit ID and Stack ID numbers;
 - 2) The beginning and ending date of the reporting period;
 - 3) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
 - 4) The date, time and results of each Method 9. If no Method 9 were performed during the reporting period, the owner or operator may submit a negative declaration; and
 - 5) Description of any corrective action taken pursuant to AC # 2.b.iii.
- c. Control Device C7
 - i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the control devices:
 - 1) Emission Unit ID and Control ID numbers;
 - 2) The beginning and ending date of the reporting period;
 - 3) Identification of the operating parameter being monitored to demonstrate ongoing compliance;
 - 4) Summary information on the number, duration and cause of all excursions. Excursion is defined as any departure from the performance indicator range specified on page 23; and
 - 5) Description of the corrective action taken for each excursion.

Emission Unit U-4 Description: Power Generation - Boiler units and fuel handling

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.07	Standards of Performance for Existing Indirect Heat Exchangers	1, 2, 3 and 4
6.09	Standards of Performance for Existing Process Operations	1, 2, 3 and 5
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4 and 5
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, 4, 5, and 8

Allowable Emissions:

Emission Point	Regulated Air Pollutant	Limit/Standard
E26	PM	See AC # 1.a.
	SO ₂	See AC # 1.c.
	NO _x	See AC # 1.d.
	Opacity	< 20% (See AC # 1.b.)
E27	PM	See AC # 1.a.
	SO ₂	See AC # 1.c.
	NO _x	See AC #1.d.
	Opacity	< 20 % (See AC # 1.b.)
E28	VOC	Submerged Fill
E29 & E30	PM	8.9 lbs/hr (Each Emission Point)
	Opacity	< 20%

Components:

Emission Point	Description	Applicable Regulation	Control ID
E26	Boiler #1- Spreader Stoker Max. Rated Capacity: 121 MMBtu/hr Installation Date: 1965 Primary Fuel: Bituminous Coal Secondary Fuel: Natural Gas	6.07	C11 - Pulse Jet Baghouse
E27	Boiler #2 - Class 2B Max. Rated Capacity: 55 MMBTU/hr Installation Date: 1973 Primary Fuel: Natural Gas Secondary Fuel: Fuel Oil #6	7.06	Uncontrolled
E28	Two (2) Underground Storage Tanks for Fuel oil #6. Capacity of 30,000 gallons each.	6.13, Section 3.3	Uncontrolled
E29	Coal Unloading/Storage Silo	6.09	C12 - Bin Vent Fabric Filter
E30	Flyash Handling	6.09	C13 - Bin Vent Fabric Filter

Control Devices:

ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C-11	Pulse Jet Baghouse	Pressure drop	1.5 - 7 " H ₂ O	Record keeping Daily	Semi-annual
C-12	Bin Vent Fabric Filter	VE Survey	N/A	Record keeping See AC # 2.b.iv.	Semi-annual
C-13	Bin Vent Fabric Filter	VE Survey	N/A	Record keeping See AC # 2.b.iv.	Semi-annual

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. **PM**
 - i. The owner or operator shall not allow or cause the emissions of PM to exceed 0.31 lb/MMBTU heat input capacity from Emission Point E26

(Boiler # 1). (Regulation 6.07, section 3.1)

- ii. The owner or operator shall not allow or cause the emissions of PM to exceed 0.37 lb/MMBtu heat input capacity from Emission Point E27 (Boiler # 2). (Regulation 7.06, section 4.1.3)
- b. Opacity (Regulation 6.07, section 3.2 and 3.3; Regulation 7.06, section 4.2)
 - i. The owner or operator subject shall not allow or cause the emission into the open air of particulate matter from any indirect heat exchanger which is greater than 20% opacity, except during the following conditions:
 - 1) The owner or operator shall not allow or cause the emissions into the open air of particulate matter from any indirect heat exchanger during building a new fire, cleaning the fire box, or blowing soot for a period or periods aggregating not more than ten minutes in any 60 minutes which are less than 40% opacity.
 - 2) Emissions from waterwall spreader-stoker indirect heat exchangers during startup operations if the emissions do not exceed the following:
 - A) First 30 minutes - 80% opacity;
 - B) Next hour - 60% opacity; and
 - C) Next 2 ½ hours - 40% opacity.
 - 3) Emissions up to 40% opacity from all other waterwall indirect heat exchangers for any 30-minute period during startup operations.
- c. SO₂
 - i. The owner or operator subject shall not allow or cause the emissions of SO₂ from E26 to exceed 1.57 lb/MMBtu heat input capacity when combusting coal and 1.0 lb/MMBtu heat input when combusting natural gas. (Regulation 6.07, section 4.1)
 - ii. The owner or operator subject shall not allow or cause the emissions of SO₂ from E27 to exceed 0.92 lb/MMBtu heat input capacity when combusting natural gas or fuel oil #2. (Regulation 7.06, section 5.1.3.1)
- d. NO_x
 - I. The owner or operator shall not allow or cause the combined emissions of NO_x from Emission Points 26 (Boiler #1) and 27 (Boiler #2) to equal or exceed 100 tons during any consecutive 12-month period in order to avoid being subject to the requirements of District regulation 6.42.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The owner or operator shall monitor the following parameters daily to demonstrate ongoing compliance with the hourly PM emission limits:
 - 1) The type and quantity of fuel combusted in each boiler for each operating day;
 - 2) The hours of operation for each boiler for each operating day;
 - 3) The pressure drop across baghouse C11 for proper operation. The performance indicator range shall be 1.5-7 inches of water. The owner or operator shall perform the necessary maintenance when the pressure drop is 6 inches of water. The unit alarm system shall be set to sound when the pressure drop reaches 7 inches of water.
 - 4) Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.
 - 5) Visually inspect, on a monthly basis, the operation of the coal and flyash fabric filters, C12 and C13 respectively. Any noted material failures shall have repairs instituted within 7 days after discovery.

b. Opacity

- i. The owner or operator shall comply with the following opacity monitoring requirements when combusting coal in Boiler #1:
 - 1) The owner or operator shall conduct a daily one (1) minute visible emissions survey.
 - 2) If during sixty (60) consecutive operating days there are no visible emissions observed from E-26, the owner or operator may elect to conduct a weekly visible emission survey.
 - 3) If visible emissions are observed from E-26, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance. Subsequent visible emissions surveys shall be performed according to AC # 2.b.i.1.
- ii. The owner or operator shall comply with the following opacity monitoring requirements when combusting fuel oil #6 in Boiler #2:
 - 1) The owner or operator shall conduct a daily one (1) minute visible emissions survey; or
 - 2) If during sixty (60) consecutive operating days there are no visible emissions observed from E-27, the owner or operator may elect to

conduct a weekly visible emission survey.

- 3) If visible emissions are observed from E-27, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance. Subsequent visible emissions surveys shall be performed according to AC # 2.b.ii.1.
- iii. The owner or operator shall comply with the following opacity monitoring requirements when combusting natural gas in Boiler #1 or Boiler #2:
- 1) The owner or operator shall conduct a monthly one (1) minute visible emissions surveys.
 - 2) If visible emissions are observed from E-26 or E-27 when combusting natural gas, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance.
- iv. The owner or operator shall comply with the following opacity monitoring requirements for emission points E29 and E30:
- 1) For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours.
 - 2) For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emission survey.
 - 3) At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance.

Subsequent visible emission surveys shall be conducted as specified in AC# 2.b.iv.1.

- 4) If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.
 - c. SO₂
 - i. The owner or operator shall monitor the following to demonstrate ongoing compliance with the SO₂ limits specified in this permit:
 - 1) The type and quantity of fuel combusted in each boiler for each operating day;
 - 2) The total operating hours for each boiler for each operating day; and
 - 3) The coal and/or fuel oil #6 sulfur content.
 - d. NO_x
 - i. The owner or operator shall monitor the following to demonstrate ongoing compliance with the NO_x limits specified in this permit:
 - 1) The type and quantity of fuel combusted in each boiler for each operating day; and
 - 2) The total operating hours for each boiler for each operating day.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
- a. PM/SO₂
 - i. The owner or operator shall maintain records that show heating value, ash, and sulfur content for each shipment of coal and fuel oil #6.
 - ii. The owner or operator shall maintain records of the type and quantity of fuel combusted in each boiler for each operating day.
 - iii. The owner or operator shall maintain records of the hours of operation for each boiler for each operating day.
 - b. Opacity
 - i. The owner or operator shall maintain records of the results of all visible emission surveys and Method 9 tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b. above shall be documented and records made available to the District upon request.
 - c. NO_x

- i. The owner or operator shall maintain records of the type and quantity of fuel combusted for each operating day.
- ii. The owner or operator shall maintain records of the hours of operation for each boiler for each operating day.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM and SO₂

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM and SO₂:
 - 1) Emission Unit/Point ID Number;
 - 2) The beginning and ending date of the reporting period;
 - 3) All periods of exceedances of the PM and SO₂ emission standard including the quantity of excess emissions;
 - 4) Reason for excess emissions; and
 - 5) Description of any corrective action taken to prevent future exceedances of the PM or SO₂ emission standard.

b. Opacity

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
 - 1) Emission Unit/Point ID number;
 - 2) The beginning and ending date of the reporting period;
 - 3) The date, time and results of each Method 9 performed. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
 - 4) Description of any corrective action taken pursuant to AC# 2.b.i.3., AC# 2.b.ii.3., AC# 2.b.iii.2. or AC # 2.b.iv.3 above.

c. Control Devices C11

- (1) Emission Unit ID and Control ID numbers;
- (2) The beginning and ending date of the reporting period;
- (3) Identification of the performance parameter that is being monitored;
- (4) Number, duration and cause of all excursions. Excursion is defined as any departure from the performance indicator range or normal operation of the control device; and
- (5) Description of the corrective action taken for each excursion.

Emission Unit U-5 Description: Bottling line for low-alcohol beverages.

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance With Emission Standards and Maintenance Requirements	1, 4 and 5
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 6, 7 and 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4 and 5

Allowable Emissions:

Regulated Air Pollutant	Limit/Standard
VOC	< 5 tpy

Components:

Emission Pt	Description	Applicable Regulation	Control ID
E33	400 gallon Flavoring Blend Tank (1997)	1.05 & 7.25	Uncontrolled
E34	12,000 gallon JD80 Storage Tank (1997)	7.12	
E35	10,000 #1 Blending Bottling Tank (1997)	1.05 & 7.25	
E36	10,000 #2 Blending Bottling Tank (1997)	1.05 & 7.25	
E37	10,000 #3 Blending Bottling Tank (1997)	1.05 & 7.25	

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC (Regulation 7.25, Section 3)
 - i. The owner or operator shall not allow or cause the VOC emissions to equal or exceed 5 tons per year.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

- i. The owner or operator shall monitor the monthly production rate to demonstrate ongoing compliance with the annual VOC emission limit.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

- i. The owner or operator shall maintain the following records to demonstrate ongoing compliance with the VOC limits:
 - 1) The monthly production rate; and
 - 2) The total VOC emissions for each calendar month.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC:
 - 1) Emission Unit ID number;
 - 2) The beginning and ending date of the reporting period; and
 - 3) The twelve consecutive month VOC emissions for each month of the reporting period.

Emission Unit U-6 Description: Warehouse for barrel storage and whiskey aging.

Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
1.05	Compliance With Emission Standards and Maintenance Requirements	Section 1.2

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC
 - i. This emission unit is not subject to any facility specific VOC emission standards.
2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)
 - a. VOC
 - i. The owner or operator shall monitor the monthly inventory of the barrels stored in the warehouses.
 - ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 4.
3. **Daily Compliance with VOC Emission Standard** (Regulation 1.05, section 4.1.2)
 - a. The owner or operator shall maintain records that demonstrate compliance using the following calculation methodology:

$$E_{\text{VOC}} = A_{\text{loss}} \times B_{\text{storage}}$$

where: E_{VOC} = VOC emissions (in lbs)
 A_{loss} = Average weight loss per barrel (10.5 lbs)
 B_{storage} = Number of barrels in storage (each month)
4. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
 - a. VOC

- i. The owner or operator shall maintain monthly records of the following:
 - 1) Original Proof Gallons (OPG) produced; and
 - 2) The monthly inventory of the barrels stored in the warehouses.

5. **Reporting** (Regulation 2.16, section 4.1.9.3)

There are no semi-annual compliance monitoring reports required.

Comments:

Warehouse emissions are fugitive ethanol emissions. The average emission factor (developed by Brown-Forman Corporation) is 10.5 lbs/barrel/year for barrel storage/aging in warehouse which is based upon a mass balance study for an enclosed heat-cycled warehousing operation.

Emission Unit U-7 Description: Parts Cleaners (Non-halogenated Cold Solvent)**Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2, 4.3 and 4.4

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

Allowable Emissions:

Emission Pt	Regulated Air Pollutant	Standard/Limit
E38-39	VOC	See AC # 1.a.
	TAPs	See AC # 1.b.

Control Devices: There are no control devices associated with this emission unit.

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. VOC (Regulation 7.18, Section 3 & 4)
 - i. Control equipment
 - 1) The cleaner shall be equipped with a cover;
 - 2) The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner;
 - 3) A permanent, conspicuous label summarizing the operating requirements in AC# 1.ii. shall be installed on or near the cleaner; and
 - 4) If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive

splashing;

ii. Operating Requirements

- 1) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.
- 2) Close degreaser cover whenever not handling a part in the cleaner.
- 3) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- 4) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20EC (68EF).

b. TAPs (Regulation 5.12)

- i. The owner or operator shall not allow or cause the emissions of TAP's to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

- i. The owner or operator shall conduct weekly inspections to verify ongoing compliance with the control and operational requirements specified in AC # 1.a.i. and 1.a.ii.

b. TAP

- i. Compliance monitoring for each TAP emission standard shall be the record keeping requirement in AC # 3.b.

3. **Record Keeping** (Regulation 7.18, section 4.4.2)

a. VOC

- i. The owner or operator shall maintain records that include the following for each purchase:
 - 1) The name and address of the solvent supplier,
 - 2) The date of the purchase,
 - 3) The type of the solvent, and
 - 4) The vapor pressure of the solvent measured in mm Hg at 20EC (68EF).

- ii. The owner or operator shall maintain records of the results of the inspection requirement specified in AC # 2.a.i.
 - b. TAP
 - i. The owner or operator shall maintain monthly records of the quantity of each solvent used including the weight % of each TAP.
- 4. **Reporting** (Regulation 2.16, section 4.1.9.3)
 - a. VOC/TAP
 - i. There are no compliance monitoring reports required for this emission unit.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Alternative Operating Scenarios

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

Off-Permit Documents

There are no Off-Permit documents associated with the issuance of this permit.

SOURCE-WIDE HAP SPECIATION			
HAP	CAS No.	HAP	CAS No.
Hydrochloric Acid	7647-01-0	Hydrogen Fluoride	7664-39-3

Note: HAPs cited in the table above are those currently known to be used at this plant and were identified in the Title V permit application.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Storage of lubricants or fuel oils, which have a vapor pressure less than 10 mm Hg at 20 degrees C	Various	Regulation 2.02, section 2.3.9.2
Indirect heat exchangers, less than 10 MMBTU/hr capacity	Various	Regulation 2.02, Section 2.1.1
Research and Development Activities with potential emissions less than 5 tons per year	1	Regulation 2.02, Section 2.3.27
Portable fuel tanks with a capacity of less than 500 gallons and VOC storage vessels with a capacity of less than 250 gallons.	Various	Regulation 2.02, Sections 2.3.23 and 2.3.24
Dust collectors which vent indoors and collect less than 1 tpy of material.	Various	Regulation 2.02, Section 2.3.21

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Storage tanks for diesel or fuel oil usage. Fuel is not used for sale or distribution. Annual fuel turnover < twice the tank capacity of 30,000gallons	2	Regulation 2.02, Section 2.3.25
Internal combustion engines, fixed or mobile.	Various	Regulation 2.02, Section 2.2
Brazing, soldering and welding equipment	Various	Regulation 2.02, Section 2.3.4

1. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
 - b. No periodic monitoring shall be required for facilities designated as insignificant activities.